



KAUFMAN BORGEEST & RYAN LLP

120 BROADWAY, NEW YORK, NY 10271
TEL: 212.980.9600 FAX: 212.980.9291 WWW.KBRLAW.COM

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LAURA B. JUFFA
DIRECT: 646.367.6716
LJUFFA@KBRLAW.COM

VIA ECF

Honorable Ramon E. Reyes, Jr.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Donaldo A. Torrenegra v. Grameen America, Inc., et al.
E.D.N.Y. Civil Action No.: 15-CV-03153(WFK)(RER)

Dear Judge Reyes:

We represent the Defendants, Grameen America, Inc. ("GAI") and Grameen America NY, Inc. (collectively "Defendants"), in the above-referenced matter. We write jointly with Plaintiffs' counsel regarding anticipated motion practice in this matter.

At the December 16, 2015 Status Conference, the Court suggested that the parties consider whether it would be a more reasonable and expeditious resolution of the parties' dispute if Defendants' anticipated motion for summary judgment on the issue of whether Plaintiffs' position(s) are exempt under the FLSA is made prior to Plaintiffs' anticipated motion for conditional certification of a collective action. Plaintiffs subsequently requested a Pre-Motion Conference in connection with Plaintiffs' anticipated motion for conditional certification under the Fair Labor Standards Act ("FLSA") § 216(b).

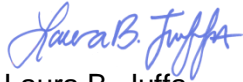
Following Plaintiffs' filing of the Pre-Motion Conference request, the parties conferred further regarding the sequence of motion practice in this case. The Parties have entered into a Tolling Agreement with respect to the statute of limitations for the FLSA 216(b) collective action. Plaintiffs have confirmed their willingness to refrain further from pursuing a motion for conditional certification of a collective action until after the parties have the opportunity to complete discovery, brief the issue(s) on summary judgment, and receive the Court's decision on the summary judgment motion.

Accordingly, Plaintiffs withdraw their request for a Pre-Motion Conference in connection with the anticipated motion for conditional certification of a collective action, and Defendants therefore request, that the deadline for the response to Plaintiffs' request for Pre-Motion Conference currently due on January 22, 2016 be cancelled.

The parties have requested cancellation of the Pre-Motion Conference currently scheduled before Judge Kuntz for February 4, 2016.

Respectfully submitted,

KAUFMAN BORGEESE & RYAN LLP



Laura B. Juffa

cc: (via ECF)

Neil H. Greenberg
Neil H. Greenberg & Associates P.C.
Attorneys for Plaintiff